



January 11, 2010 22M:393:mem:1012

Ms. Kathryn D. Flores County of San Benito Community Services & Workforce Development 1111 San Felipe Road, Suite 207 Hollister, CA 95023

Dear Ms. Flores:

AMERICAN RECOVERY AND REINVESTMENT ACT (ARRA) SUMMER YOUTH PROGRAM FINAL MONITORING REPORT PROGRAM YEAR 2009

This is to inform you of the results of our review for Program Year (PY) 2009 monitoring review of the of San Benito Community Services and Workforce Development (CSWD)'s ARRA Summer Youth Program (SYP). This review was conducted by Ms. Molly Maloney and Ms. Cynthia Parsell from July 20, 2009, through July 23, 2009. Our review consisted of interviews with your staff and a review of the following items: expenditures charged to the ARRA SYP, oversight of your subrecipients, and procurement transactions. In addition, we interviewed service provider staff, SYP participants, and worksite supervisors, and focused on the following areas of your ARRA SYP: eligibility determination, program operations, participant worksites, participant payroll processing, and oversight.

Our review was conducted under the authority of Section 667.410(b)(1), (2) & (3) of Title 20 of the Code of Federal Regulations (20 CFR). The purpose of this review was to determine the level of compliance by CSWD with applicable federal and state laws, regulations, policies, and directives related to the ARRA grant.

We collected the information for this report through interviews with representatives of CSWD, service provider staff, ARRA SYP worksite supervisors, and ARRA SYP participants. In addition, this report includes the results of our review of sampled case files, CSWD's response to Section I and II of the ARRA SYP Onsite Monitoring Guide, and a review of applicable policies and procedures for PY 2009.

We received your response to our draft report on December 15, 2009, and reviewed your comments and documentation before finalizing this report.

BACKGROUND

The CSWD allocated all of its \$327,127 ARRA Youth allocation to serve 115 summer youth program participants. As of September 15, 2009, CSWD expended \$250,000 to serve 151 SYP participants.

ARRA SYP REVIEW RESULTS

While we concluded that, overall, CSWD is meeting applicable ARRA requirements, we identified a condition that may become a compliance issue if not addressed. Specifically, applicants are routinely signing blank applicant statements. The CSWD stated that this is to ease the application process and that if these forms are not used they are usually shredded. However, we found case files with signed, blank applicant statements. We suggested that CSWD discontinue the practice of having applicants sign blank applicant statements.

In its response, CSWD stated that they will ensure that only signed applicant statements are placed in the case files. All blank applicant statements have been removed from the intake packets and will be made available to the clients upon request and/or need. The CSWD will comply with all requirements. The CSWD's response adequately addressed our concern and no further action is necessary.

Because the methodology for our monitoring review included sample testing, this report is not a comprehensive assessment of all the areas included in our review. It is CSWD's responsibility to ensure that its systems, programs, and related activities comply with the ARRA grant program, Federal and State regulations, and applicable State directives. Therefore, any deficiencies identified in subsequent reviews, such as an audit, would remain CSWD's responsibility.

Please extend our appreciation to your staff for their cooperation and assistance during our review. If you have any questions regarding this report or the review that was conducted, please contact Ms. Mechelle Hayes at (916) 654-1292.

Sincerely,

JESSIE MAR, Chief

Compliance Monitoring Section

Compliance Review Office

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